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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAMIKKO FOSTER,

15 Defendant.
16

Case No. 2:19-mj-123-NJK

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Jamikko Foster, that the
21 Court modify his conditions of release.

22 The Stipulation is entered into for the following reasons:

23 1. On February 13, 2019, Mr. Foster appeared before this court for his initial
24 appearance on a complaint and was ordered released. One of his release conditions was to
25 “satisfy all outstanding warrants within 90 days and provide verification to Pretrial Services.”
26 Mr. Foster had numerous local warrants and one outstanding warrant from California.

2. Since his release, he has satisfied all outstanding local warrants and has provided proof of that to pretrial services. The only outstanding warrant at this time is out of California. Mr. Foster contacted the California court to see what it would take to resolve that warrant, and he was told that he would have to surrender to custody and serve out the remainder of his suspended sentence. Surrendering to custody in California would negatively impact Mr. Foster's case and would impede the parties ability to promptly resolve this case. The parties are close to entering into a pre-indictment resolution.

3. As such, the parties are requesting that the Court grant Mr. Foster an additional 180 days to resolve his outstanding warrant. That time will allow this case to move forward without delay.

4. This is the first stipulation to modify conditions of release filed herein.

DATED this 25th day of March, 2019.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Heidi A. Ojeda
By _____
HEIDI A. OJEDA
Assistant Federal Public Defender

/s/ Phillip N. Smith, Jr.
By _____
PHILLIP N. SMITH, JR.
Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMIKKO FOSTER,

Defendant.

Case No. 2:19-mj-123-NJK

ORDER

IT IS THEREFORE ORDERED that Mr. Foster's condition of release be modified to require him to resolve his outstanding warrant no later than August 12, 2019.

DATED this 25th day of March, 2019.



NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE